

## **Statement of Basis**

**Epson Toyocom Seattle, Inc.  
1850 Prudential Boulevard  
Longview, WA 98632  
ST 6185**

Ecology re-issued the wastewater permit for Epson Toyocom Seattle on January 20, 2006, and it became effective July 1, 2006. Epson Toyocom became aware of an unintended change to their original permit, concerning pH monitoring. The new permit required a continuous pH meter and continuous monitoring. Epson Toyocom requested that Ecology change the permit to reflect the requirements contained in the original permit, via letter dated June 28, 2006 and received by Ecology July 3, 2006. This letter describes Epson Toyocom's current batch neutralization, monitoring, and discharge protocol.

Epson Toyocom neutralizes wastewater in batches. Each discrete batch is diluted, neutralized, monitored and adjusted for pH compliance. When the proper pH has been attained and stabilized, the batch is released. Therefore, recording the pH of the batch before release is sufficient for permit reporting and compliance determination. After the batch is discharged, a new batch of wastewater enters the tank, when needed.

Continuous pH monitoring, while common, is not necessary or easily implemented at Epson Toyocom. Due to the batch discharge and the physical operation of the neutralization system, a given batch should retain the same pH for the entire batch. Each batch is essentially continuously monitored, since the pH should not change after stabilization. A continuous pH meter would offer no better compliance assurance.

Therefore, Ecology agrees with Epson Toyocom's request and hereby agrees to modify the permit requested. The modification will include the following:

1. Sampling frequency of pH is changed from "Continuous when discharging" to "Once per batch" (permit Special Condition S2.A.)
2. Sample Type for pH is changed from "Metered" to "Grab" (permit Special Condition S2.A.)
3. Ecology will change the Permittee's name from Toyocom Devices of America, Inc., to Epson Toyocom Seattle, Inc. to reflect the company's current name (permit cover page)

This Statement of Basis will serve as an amendment to the permit and fact sheet.